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*Attorneys for Defendants Apartment Management
Consultants, LLC, and Rene Richardson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*
PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company; and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**Stipulation and Order to Extend Deadline
for Plaintiff Peggy Thornton and
Defendants Apartment Management
Consultants, LLC and Rene Richardson to
Submit Reply to TMIF's Limited
Opposition to Joint Settlement Motion**

(First Request)

Defendants Apartment Management Consultants, LLC and Rene Richardson (collectively “AMC”); Plaintiff-Relator Peggy Thornton; and TMIF II Portola, LLC (“TMIF”), by and through their respective undersigned counsel, hereby stipulate to extend Ms. Thornton and AMC’s deadline to submit a reply in support of their joint motion to approve settlement and distribution of settlement funds (“Joint Motion”) until February 20, 2025, with the following background and reasons:

1. Ms. Thornton and AMC submitted the Joint Motion (ECF No. 124) on January 8, 2025.

2. As explained in the Joint Motion, Ms. Thornton and AMC have agreed on a settlement amount to resolve claims against the latter but required Court approval given that the United States had not stated whether it had any objection to the settlement terms.

3. The United States subsequently filed a partial objection to the Joint Motion, stating that it does *not* ultimately object to settlement or the settlement amount but requires any settlement to conform to its specifications, including distribution of settlement funds directly to the United States. ECF No. 128.

4. The United States, Ms. Thornton, and AMC have since conferred and agreed to jointly work on a written settlement agreement based on the Government’s specifications.

5. Execution of the settlement agreement would result in a stipulation dismissing the claims against AMC and withdrawal of the Joint Motion.

6. The Government, Ms. Thornton, and AMC therefore stipulated to extend the time to reply to the Government’s limited opposition to provide time to complete the settlement agreement. ECF Nos. 130.

7. The Court granted that stipulation. ECF No. 131.

8. In the interim, TMIF filed its own limited opposition to the Joint Motion. ECF No. 133.

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9. TMIF, Ms. Thornton, and AMC thus stipulate to extend Ms. Thornton and AMC's time to reply to TMIF's limited opposition to February 20, 2025, to align with Ms. Thornton's and AMC's time to reply to the Government's limited opposition.

IT IS SO STIPULATED.

Dated: February 12, 2025.

SNELL & WILMER L.L.P.

By: /s/ Gil Kahn

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*Attorneys for Defendant Apartment
Management Consultants, LLC and Rene
Richardson*

Dated: February 12, 2025.

NEVADA LEGAL SERVICES

By: /s/ Kristopher Pre

Kristopher Pre
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530 South 6th Street
Las Vegas, Nevada 89101

Attorneys for Relator

Dated: February 12, 2025.

McDONALD CARANO LLP

By: /s/ Rory T. Kay

Rory T. Kay (NSBN 12416)
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Attorneys for Defendant TMIF II Portola, LLC

ORDER

Good cause appearing, the foregoing stipulation is **GRANTED**. Ms. Thornton and AMC's deadline to submit a reply to TMIF's limited opposition and in support of their joint motion to approve settlement and distribution of settlement funds is extended to and including February 20, 2025.

IT IS SO ORDERED.



CHIEF UNITED STATES DISTRICT JUDGE

DATED: February 12, 2025

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **Stipulation and Order to Extend Deadline for Plaintiff Peggy Thornton and Defendants Apartment Management Consultants, LLC and Rene Richardson to submit Reply supporting their Joint Motion to Approve Settlement and Distribution of Settlement Funds [ECF No. 124]** by method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED February 12, 2025

/s/ Tiy Lewis
An employee of SNELL & WILMER L.L.P.